

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: :  
 : Chapter 11  
GAWKER MEDIA LLC, :  
 :  
 : Case No.: 16-11700 (SMB)  
Debtors. :  
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**DECLARATION OF JAY M. WOLMAN**

I, Jay M. Wolman, declare:

1. I am over 18 years of age and have first-hand knowledge of the facts set forth herein, and if called as a witness, could and would testify competently thereto.

2. I am an attorney licensed to practice in the State of New York and before the Bar of this Court.

3. I am attorney of record for Claimants Charles C. Johnson and Got News LLC (collectively, "Claimants") in this matter, and I submit this declaration in support of Claimants' Opposition to Omnibus Objections to Proofs of Claim as to Charles C. Johnson and Got News LLC, filed herewith (Claimants' "Opposition").

4. Attached to Claimants' Opposition as Exhibit 1 is a true and correct copy of the article Greg Howard, "Charles Barkley Has Nothing To Say To America," DEADSPIN, Dec. 4, 2014, as found at the URL <<https://deadspin.com/charles-barkley-has-nothing-to-say-to-america-1666864783>>.

5. Attached to Claimants' Opposition as Exhibit 2 is a true and correct copy of the article Charles C. Johnson, "BREAKING: GotNews Wins First Stage of Appeal on #MichaelBrown Records #Ferguson #EricGarner," GOTNEWS, Dec. 5, 2014, as found at the URL <<http://gotnews.com/breaking-gotnews-wins-first-stage-appeal-michaelbrown-records-ferguson-ericgarner/>>.

6. Attached to Claimants' Opposition as Exhibit 3 is a true and correct copy of the article J.K. Trotter, "What is Chuck Johnson, and Why? The Web's Worst Journalist, Explained,"

GAWKER, Dec. 9, 2014, as found at the URL < <http://gawker.com/what-is-chuck-johnson-and-why-the-web-s-worst-journal-1666834902>>.

7. Attached to Claimants' Opposition as Exhibit 4 is a true and correct copy of the article Greg Howard, "Wait, Did Clowntroll Blogger Chuck Johnson Shit on the Floor One Time?", THE CONCOURSE, Dec. 9, 2016, as found at the URL <<https://web.archive.org/web/20160506114918/http://theconcourse.deadspin.com/wait-did-clowntroll-blogger-chuck-johnson-shit-on-the-1668919746?>>>.

8. Attached to Claimants' Opposition as Exhibit 5 is a true and correct copy of the article J.K. Trotter, "The Daily Caller Can't Quit Chuck Johnson," GAWKER, Dec. 9, 2014, as found at the URL <<http://gawker.com/the-daily-caller-can-t-quit-chuck-johnson-1668910086>>.

9. Attached to Claimants' Opposition as Exhibit 6 is a true and correct copy of the article J.K. Trotter, "Which of These Disgusting Chuck Johnson Rumors are True?", GAWKER, Dec. 15, 2014, as found at the URL <<http://gawker.com/which-of-these-disgusting-chuck-johnson-rumors-are-true-1669433099>>.

10. Attached to Claimants' Opposition as Exhibit 7 is a true and correct copy of the Order of Dismissal in *Johnson v. Gawker Media, LLC*, Case No. 4:15-CV-1137-CAS (MO E.D. Jan. 15, 2016).

11. Attached to Claimants' Opposition as Exhibit 12 is a true and correct copy of the article Ruby Cramer, "Cory Booker: Yes, I Live In Newark," BUZZFEED NEWS, Oct. 14, 2013, as found at the URL <<https://www.buzzfeed.com/rubycramer/cory-booker-yes-i-live-in-newark>>.

12. Attached to Claimants' Opposition as Exhibit 13 is a true and correct copy of the article Charles C. Johnson, "Neighbors: Cory Booker never lived in Newark," THE DAILY CALLER, Oct. 14, 2013, as found at the URL <<http://dailycaller.com/2013/10/14/neighbors-cory-booker-never-lived-in-newark/>>.

13. Attached to Claimants' Opposition as Exhibit 14 is a true and correct copy of the article Matthew Boyle, "Women: Sen. Bob Menendez paid us for sex in the Dominican Republic [VIDEO]," THE DAILY CALLER, November 1, 2012, as found at the URL

<<http://dailycaller.com/2012/11/01/women-sen-bob-menendez-paid-us-for-sex-in-the-dominican-republic/>>.

14. Attached to Claimants' Opposition as Exhibit 15 is a true and correct copy of the article Rhonda Schwartz, "The Menendez Prostitution 'Scandal': How It Happened," ABC NEWS, Mar. 6, 2013, as found at the URL <<http://abcnews.go.com/Blotter/robert-menendez-prostitution-scandal-happened/story?id=18664472>>.

15. Attached to Claimants' Opposition as Exhibit 16 is a true and correct copy of the article Carol D. Leonnig, "Sen. Robert Menendez seeks probe of alleged Cuban plot to smear him," THE WASHINGTON POST, July 7, 2014, as found at the URL <[http://www.washingtonpost.com/politics/sen-robert-menendez-seeks-probe-of-alleged-cuban-plot-to-smear-him/2014/07/07/e9ba25a0-efe8-11e3-914c-1fbd0614e2d4\\_story.html](http://www.washingtonpost.com/politics/sen-robert-menendez-seeks-probe-of-alleged-cuban-plot-to-smear-him/2014/07/07/e9ba25a0-efe8-11e3-914c-1fbd0614e2d4_story.html)>.

16. Attached to Claimants' Opposition as Exhibit 17 is a true and correct copy of the article Charles C. Johnson, "EXCLUSIVE: What We Found On #MichaelBrown's Instagram Account," GOTNEWS, Sept. 5, 2014, as found at the URL <<http://gotnews.com/found-michaelbrowns-instagram-account/>>.

17. Attached to Claimants' Opposition as Exhibit 18 is a true and correct copy of the article Adam Weinstein, "James O'Keefe Wannabe 'Exposes' Michael Brown's Instagram," FORTRESSAMERICA, Sept. 5, 2014, as found at the URL <<http://fortressamerica.gawker.com/james-okeefe-wannabe-exposes-michael-browns-instagram-1631039505>>.

18. Attached to Claimants' Opposition as Exhibit 19 is a true and correct copy of the article "No charges against Darren Wilson, grand jury decides," ST. LOUIS POST-DISPATCH, Nov. 24, 2014, as found at the URL <[http://www.stltoday.com/news/local/crime-and-courts/no-charges-against-darren-wilson-grand-jury-decides/article\\_9afc71c9-a858-5f37-aba3-faba3fe12dfe.html](http://www.stltoday.com/news/local/crime-and-courts/no-charges-against-darren-wilson-grand-jury-decides/article_9afc71c9-a858-5f37-aba3-faba3fe12dfe.html)>.

19. Attached to Claimants' Opposition as Exhibit 21 is a true and correct copy of a description of the Kinja Platform, as found at the URL <<http://advertising.gawker.com/platform/>>.

20. Attached to Claimants' Opposition as Exhibit 22 is a true and correct copy of Gawker's twitter page, as found at the URL <<https://twitter.com/gawker>>.

21. Attached to Claimants' Opposition as Exhibit 23 is a true and correct copy of Plaintiffs' Memorandum in Opposition to Defendants' Motion to Dismiss in *Johnson v. Gawker Media, LLC*, Case No. 4:15-cv-1137-CAS (Oct. 22, 2015).

22. Attached to Claimants' Opposition as Exhibit 24 is a true and correct copy of the article Charles C. Johnson, "CORRECTED... #JackieCoakley Retweeted Slut Walk 2011," GOTNEWS, Dec. 9, 2014, as found at the URL <<http://gotnews.com/breaking-fraud-jackiecoakley-cried-rape-uvahoax/>>.

23. Attached to Claimants' Opposition as Exhibit 25 is a true and correct copy of the article Brendan O'Connor, "Very Mad Donald Trump Calls the *Boston Globe* 'Stupid' and 'Worthless' in Response to Satirical Front Page," GAWKER, April 11, 2016, as found at the URL <<http://gawker.com/very-mad-donald-trump-calls-the-boston-globe-stupid-a-1770239322>>.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 16<sup>th</sup> day of November 2016.

/s/ Jay M. Wolman  
Jay M. Wolman